

1 THE HONORABLE ROBERT S. LASNIK
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9
10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 ESTATE OF FRANK B. LYNOTT, by and
14 through BRUCE R. MOEN, personal
15 representative;

16 Plaintiff,

17 v.

18 LAURIE A. LUCKOVICH, individually; et al.;

19 Defendants.

20 No. 2:14-cv-00503-RSL

21 **STIPULATED MOTION SETTING
22 NEW TRIAL DATE AND
23 AMENDING CERTAIN CASE
24 DEADLINES**

25 The parties hereto, by and through their attorneys of record, recognize and
acknowledge that the stay in this case has expired and that a new trial date must be assigned
and certain case deadlines reset as a result of defendants' retention of new counsel. Those
proposed deadlines are listed below, pending approval of the Court.

26 The Parties agree that the Order Setting Trial Date and Other Related Dates issued
27 March 7, 2016 should be amended to extend all case schedule deadlines to reflect a new
28 trial date of April 2, 2018 or the Court's earliest available date thereafter. The parties
29 agree that only certain case deadlines should be amended, as follows:

30 **STIPULATED MOTION SETTING NEW
31 TRIAL DATE AND AMENDING CERTAIN
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- 1 -

33 2:14-cv-00503-RSL

34 **LAW OFFICES OF
35 WILLIAM A. KINSEL, PLLC
36 FOURTH & BATTERY BUILDING
37 2401 4th Avenue, Suite 850
38 SEATTLE, WASHINGTON 98121
39 (206) 706-8148**

Case Event	Date
TRIAL DATE - Length of jury trial: 8-10 Days	April 2, 2018
Reports from Expert Witnesses Due	September 4, 2017
Reports from Rebuttal Expert Witnesses Due	October 23, 2017
All motions related to discovery must be <u>noted</u> on the motion calendar no later than the Friday before discovery closes pursuant to LCR 7(d) or LCR 37(a)(2)	November 30, 2017
Discovery Completed By	December 4, 2017
Settlement Conference held no later than	December 18, 2017
All dispositive motions must be filed by the stated date and noted on the motion calendar no later than the fourth Friday thereafter (see LCR 7(d)(3))	January 4, 2018
All motions in limine must be filed by and noted on the motion calendar no earlier than the <u>second</u> Friday thereafter. Replies will be accepted.	March 5, 2018
Agreed Pretrial Order Due	March 19, 2018
Pretrial Conference to be scheduled by the court	
Trial briefs, proposed voir dire questions, proposed jury instructions, and trial exhibits due	March 26, 2018

STIPULATED and AGREED this 17th day of April, 2017.

ROBERT J. WAYNE, P.S.

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By: /s/ Robert J. Wayne

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L ORDER

Based upon the foregoing stipulation it is ordered that the Order Setting Trial Date and Other Related Dates issued in this proceedings on March 7, 2016 are amended and the Courtroom Deputy is hereby instructed to issue an amended Order Setting Trial Date and Other Related dates setting a new trial date for April 2, 2018, or the Court's earliest available date thereafter and extending all case schedule deadlines consistent with that trial date and the foregoing stipulation.

Entered this 19th day of April, 2017.

JUDGE ROBERT S. LASNIK

Jointly Presented By:

ROBERT J. WAYNE, P.S.

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KINSEL, PLLC

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